

GIORDANO, HALLERAN & CIESLA, P.C.

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
WWW.GHCLAW.COM

CHRISTOPHER J. MARINO, ESQ.
SHAREHOLDER
CMARINO@GHCLAW.COM
DIRECT DIAL: (732) 224-6513

Please Reply To:
1250 BROADWAY, 36TH FLOOR
NEW YORK, NY 10001
(732) 741-3900
FAX: (732) 224-6599

November 27, 2023

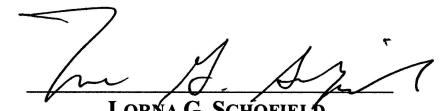
Client/Matter No. 22088-14

Via ECF

Hon. Lorna G. Schofield, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application **DENIED**. The Court does not ordinarily adjourn the initial conference pending the filing of an answer. The parties shall file their conference materials by **December 1, 2023**, and the December 6, 2023, conference will proceed as scheduled.

Dated: November 29, 2023
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Douglas Jemal v. Elliot Shalom
Southern District of New York Case No. 1:23-cv-09404-LGS

Dear Judge Schofield:

This firm is counsel to Plaintiff Douglas Jemal ("Plaintiff") in connection with the above-referenced action. I write jointly with the consent of counsel for Defendant, Elliot Shalom ("Defendant") to respectfully request a two-week adjournment of the Initial Conference scheduled for December 6, 2023, at 4:10 pm pursuant to Your Honor's Order dated October 27, 2023. There have been no prior requests for an adjournment of the Initial Conference. The only dates that will be affected by this adjournment request is the deadline to submit the joint pre-conference letter and Proposed Civil Case Management Plan and Scheduling Order currently due on November 29, 2023. Otherwise, no other scheduled dates have been set that would be affected by this adjournment request.

This adjournment is respectfully requested because Defendant's response to Plaintiff's complaint is not due until December 11, 2023, pursuant to the Stipulation to Extend So Ordered by Your Honor on November 1, 2023. As the full scope of the case and Defendant's defenses will not be clear until Defendant responds on or before December 11, 2023, the parties would benefit from Defendant's response to the complaint prior to completing a Rule 26(f) conference. This will afford the parties a better opportunity to address all issues necessary for the joint letter and Proposed Civil Case Management Plan and Scheduling Order. Accordingly, the parties jointly respectfully request that (1) the Initial Conference be adjourned to December 20, 2023, or such other day and time as is convenient for the Court and (2) the correspondence time to submit the joint pre-conference letter and Proposed Civil Case Management Plan and Scheduling Order be adjourned to one-week prior to the Initial Conference.

GIORDANO, HALLERAN & CIESLA
A Professional Corporation
ATTORNEYS-AT-LAW

Hon. Lorna G. Schofield, U.S.D.J.
November 27, 2023
Page 2

Should Your Honor like to speak with counsel regarding this request, we would be happy to make ourselves available at Your Honor's convenience. I thank Your Honor for your consideration of this matter.

Respectfully submitted,

/s/Christopher J. Marino/

CHRISTOPHER J. MARINO

cc: Harlan Lazarus, Esq. (via ECF delivery)